1 2 3 4 5 6 7 8	PILLSBURY WINTHROP SHAW PITTMAN JOHN M. GRENFELL (CA Bar No. 88500) JACOB R. SORENSEN (CA Bar No. 209134 FUSAE NARA (pro hac vice) ANDREW D. LANPHERE (CA Bar No. 1914 Four Embarcadero Center, 22nd Floor San Francisco, CA 94111 Telephone: (415) 983-1000 Facsimile: (415) 983-1200 john.grenfell@pillsburylaw.com Attorneys for Defendants SHARP CORPORATION and SHARP ELECTRONICS CORPORATION)
	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
11		
12	SAN FRANCIS	SCO DIVISION
13		
14	IN RE: TFT-LCD (FLAT PANEL) ANTITRUST LITIGATION	Master File No. 3:07-md-01827 SI (N.D. Cal.)
14	ANTITROST EFFICATION	MDL No. 1827
15		11021
16		
17	This Document Relates To:	DECLARATION OF TIMOTHY M. RUSSO IN SUPPORT OF MOTION TO
18	Motorola Mobility, Inc. v.	EXCLUDE EXPERT TESTIMONY OF ADAM K. FONTECCHIO AND B.
19	AU Optronics Corp. et al., No. 09-cv-5840 SI	DOUGLAS BERNHEIM REGARDING
	Electrograph Systems, Inc. et al.	THE "MPPI"
20	v. Epson Imaging Devices Corp.	
21	et al., No. 10-cv-0117-SI	
22	Target Corp. et al. v. AU Optronics Corp. et al., No. 10-cv-4945-SI	
23	Costco Wholesale Corp. v.	
24	AU Optronics Corp. et al., No. 11-cv-0058-SI	
25	Best Buy Co., Inc. et al. v.	
26	AU Optronics Corp. et al. No. 10-cv-4572-SI	
27	Best Buy Co., Inc. et al. v. Toshiba Corp. et al., No. 10-cv-04114-SI	
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- 1 I, Timothy M. Russo, declare as follows:
- 1. I am a member of the Bar of the State of New York and an associate at the
- 3 law firm of Pillsbury Winthrop Shaw Pittman, counsel for defendants Sharp Corporation
- 4 and Sharp Electronics Corporation ("Sharp Defendants") in the *Electrograph* and *Target*
- 5 actions listed in the caption.
- 6 2. I have personal knowledge of the facts stated herein and, if called as a
- 7 witness, I could and would competently testify thereto.
- 8 3. Attached hereto as Exhibit A is a true and correct copy of the Expert Report
- 9 of Adam K. Fontecchio, Ph.D., submitted in the *Target* case, dated December 15, 2011,
- without the exhibits and appendices other than Dr. Fontecchio's curriculum vitae.
- 4. Attached hereto as Exhibit B is a true and correct copy of the Expert Report
- of B. Douglas Bernheim, Ph.D., submitted in the *Target* case, dated December 15, 2011,
- without the exhibits and appendices other than Dr. Bernheim's curriculum vitae.
- 5. Attached hereto as Exhibit C is a true and correct copy of the Rebuttal
- 15 Expert Report of Adam K. Fontecchio, Ph.D., submitted in the *Target* case, dated May 11,
- 16 2012, without the exhibits and appendices.
- 17 6. Attached hereto as Exhibit D is a true and correct copy of the Rebuttal
- 18 Expert Report of B. Douglas Bernheim, Ph.D., submitted in the *Target* case, dated May 11,
- 19 2012, without the exhibits and appendices other than Dr. Bernheim's curriculum vitae.
- 7. Attached hereto as Exhibit E are true and correct copies of excerpts of the
- 21 Deposition of Adam K. Fontecchio, Ph.D., taken on February 9, 2012, including pages 2,
- 22 16, 17, 35-37, 62, 74, 130, 133-135, 137-140, 156-157, 169, 175, 177-179 and 204-206.
- 8. Attached hereto as Exhibit F are true and correct copies of excerpts of the
- 24 Deposition of Adam K. Fontecchio, Ph.D., taken on June 19, 2012, including pages 2, 14-
- 25 17, 24, 26-30, 92-94, 96, 97, 115-122, 127, 185 and 186.
- 9. Attached hereto as Exhibit G are true and correct copies of excerpts of the
- 27 Deposition of B. Douglas Bernheim, Ph.D., taken on January 30 February 1, 2012,
- 28 including pages 2, 27, 160-162, 203, 204, 336, 482 and 483.

1	10. Attached hereto as <u>Exhibit H</u> are true and correct copies of excerpts of the	
2	Deposition of B. Douglas Bernheim, Ph.D., taken on June 14, 2012, including pages 963,	
3	981-982, 995-996, 1015-1019, 1021-1022, 1071-1072 and 1074.	
4	11. Attached hereto as Exhibit I are true and correct copies of excerpts of the	
5	Expert Report of Dennis W. Carlton, Ph.D., submitted in the ATS Claim, AT&T Mobility,	
6	Best Buy, Costco, Electrograph and Target cases, dated February 23, 2012, including page	
7	189-196, 204-209.	
8	12. Attached hereto as Exhibit J are true and correct copies of excerpts of the	
9	Expert Report of Shukri Souri, Ph.D., submitted in the ATS Claim, AT&T Mobility, Costco	
10	Dell, Eastman Kodak, Electrograph, Motorola, Nokia, Target and the State of Florida	
11	cases, dated February 23, 2012, including pages 46-51.	
12	13. Attached hereto as <u>Exhibit K</u> is a true and correct copy of an excerpt of the	
13	Expert Report of Keith Mallison, submitted in the Costco, Dell, Eastman Kodak,	
14	Electrograph, Motorola, Nokia and Target cases, dated February 23, 2012, including page	
15	83-88.	
16	14. Attached hereto as <u>Exhibit L</u> are true and correct copies of excerpts of the	
17	Expert Report of Daniel L. Rubinfeld, Ph.D., submitted in the ATS Claim, Nokia, Motorola	
18	and Target cases, dated February 23, 2012, including pages 91-98.	
19	Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing	
20	is true and correct. Executed on the 3rd day of May, 2013, at New York, New York.	
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22	/s/ Timothy M. Russo Timothy M. Russo	
23	Tilliothy W. Russo	
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